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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

DENORAH REYNOSO

VS. : C.A. NO. 22-cv-00044-JJM-PAS

:

KYLE ENDRES, alias, ET AL

STIPULATION

During the discovery in this action, the defendants sought the identification and contact information for persons who were at or about the location of the incident involved in this matter, to wit, 102 Wesleyan Avenue. The plaintiff objected to providing such information on various grounds. The parties have resolved this discovery dispute by way of the following stipulation:

The plaintiff will not have nor seek to have any witness testify at trial (for any purpose for or against any party hereto) who was present at or about 102 Wesleyan Avenue on January 27, 2019, and whose identify and contact information is/was not disclosed to any of the defendants on or before November 1, 2022.

Nothing herein shall preclude the plaintiff from calling any of the defendants as witnesses. Moreover, nothing herein shall preclude the plaintiff from calling any City employees/agents as witnesses (such as police officers or firefighters) whether or not they were present at or about the said 102 Wesleyan Avenue, provided required disclosures are made per the Rules of Procedure and/or any governing scheduling orders.

Likewise, with regard to any persons that the defendants may call as witnesses, nothing herein is intended to relieve the defendants of any and all disclosure obligations required by the Rules of Procedure and/or any governing scheduling orders.

Attorney for the Plaintiff:

/s/ Shannah Kurland Shannah Kurland, Esq. #9186 149 Lenox Avenue Providence, RI 02907

PHONE: (401) 439-0518

EMAIL: Skurland.esq@gmail.com

Attorney for the Officer Defendants:

/s/ Michael J. Colucci Michael J. Colucci, Esq. #3302 OLENN & PENZA, LLP 530 Greenwich Avenue Warwick, RI 02886

PHONE: (401) 737-3700 FAX: (401) 737-5499

EMAIL: mjc@olenn-penza.com

Attorneys for the City of Providence:

/s/ Steven B. Nelson Steven B. Nelson, Esq. #8142 Senior Assistant City Solicitor 444 Westminster Street, Suite 220 Providence, RI 02903

PHONE: (401) 680-5333 FAX: (401) 680-5520

EMAIL: snelson@providenceri.gov

/s/ Jillian H. Barker Jillian H. Barker, Esq. #8353 Senior Assistant City Solicitor 444 Westminster Street, Suite 220

Providence, RI 02903 PHONE: (401) 680-5333 FAX: (401) 680-5520

EMAIL: jbarker@providenceri.gov

CERTIFICATION

I hereby certify that I have filed the within with the United States District Court on this 14th day of November, 2022, that a copy is available for viewing and downloading via the ECF system, and that I have caused a copy to be sent to:

Shannah Kurland, Esq. 149 Lenox Avenue Providence, RI 02907

Steven B. Nelson, Esq. Jillian H. Barker, Esq. Senior Assistant City Solicitor City Solicitor's Office 444 Westminster Street, Suite 220 Providence, RI 02903

/s/ Michael J. Colucci